

REMARKS

Favorable reconsideration of this application is requested in view of the following remarks.

Claims 1-6, 9, and 10 have been rejected under 35 U.S.C. 102(b) as anticipated by Shimakawa. Applicants respectfully traverse this rejection.

In the invention of claim 1, each battery module comprises a plurality of cells. The plurality of cells is housed in a single container with partitions between the cells. A single safety valve operates in accordance with the internal pressure of the container.

In page 2 of the Office Action, it is stated that Fig. 2 of Shimakawa illustrates a container with a plurality of cells made of multiple anodes, cathodes and interposing separators. Applicants respectfully disagree with this interpretation of the term "cell". However, even if "cell" is interpreted broadly enough to cover any individual combination of anode, cathode, and interposing separator, Shimakawa still fails to disclose partitions between the cells. There is no structure in the container of Shimakawa that separates one cell from another. Therefore, independent claim 1 is not anticipated by Shimakawa.

In view of the above, favorable reconsideration in the form of a Notice of Allowance is requested.

Respectfully submitted,

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